

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.

V.

Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

**THIS DOCUMENT RELATES TO:**

4:23-cv-05448.

MDL No. 3047

Case No.: 4:23-cv-05448-YGR

**DECLARATION OF MEGAN O'NEILL  
IN SUPPORT OF STIPULATED  
REQUEST FOR AND [PROPOSED]  
ORDER EXTENDING THE STATE  
ATTORNEYS GENERAL'S TIME TO  
MOVE TO STRIKE ANY PORTION OF  
THE META DEFENDANTS' ANSWER**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

I, MEGAN O'NEILL, declare and state as follows:

1. I am a Deputy Attorney General in the Consumer Protection Section of the California Department of Justice. I am a member of good standing of the State Bar of California. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify completely to the truth of the matters stated herein.

1       2. I submit this declaration, as required by Civil Local Rule 6-2, in support of the Stipulated  
2 Request for Order Extending the State Attorneys General's Time to Move to Strike any Portion of the  
3 Meta Defendants' Answer.

4       3. Meta filed its Answer to the State Attorneys General's ("State AGs") Complaint on  
5 October 17, 2024 (the Answer). Dkt. No. 125;

6       4. Meta's Answer includes sixty (60) paragraphs of purported affirmative defenses;

7       5. The State AGs believe that certain defenses are improper, and have been working diligently  
8 to evaluate the Answer and consult with their coalition regarding a motion to strike under Fed. R. Civ. P.  
9 12(f). Such a motion would currently be due on November 7, 2024;

10       6. On November 4, 2024, I contacted counsel for Meta regarding the State AGs' intent to  
11 move to strike portions of the Answer. In response, counsel for Meta informed the State AGs that Meta  
12 intends to file an amended answer and is willing to confer with the State AGs about affirmative defenses  
13 the State AGs may move to strike;

14       7. The Parties have agreed that they will confer over the next ten (10) days regarding a  
15 schedule for both the filing of an amended answer and any motion to strike, including to establish agreed-  
16 upon deadlines for any amended answer, motion to strike, and subsequent briefing;

17       8. The State AGs have consented to the filing of Meta's amended answer on a date to be  
18 agreed upon by the Parties after November 7, 2024;

19       9. The Parties agree that they will submit proposed deadlines for the filing of Meta's amended  
20 answer and the State AGs' motion to strike by no later than November 20, 2024, and that in the meantime  
21 an extension of the State AGs' time to file a motion to strike any portion of the Answer to November 27,  
22 2024, would allow adequate time for the Parties to complete this meet-and-confer process;

23       10. There have been no previous time modifications in this case with respect to the filing of  
24 Meta's amended answer or the State AGs' response to Meta's Answer. The Court recently granted an  
25 extension of discovery, Rule 702, and summary judgment deadlines that were mutually agreed on by the  
26

1 parties. (*In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-  
2 md-03047 (N.D. Cal. Oct. 29, 2024), Dkt. No. 1290);

3 11. The Parties agree that the relief sought in the Stipulated Request will not affect the schedule  
4 of this case.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed on November  
6, 2024, in San Francisco, California.

7 DATED: November 6, 2024  
8

9 /s/ Megan O'Neill

10 MEGAN O'NEILL  
11 Deputy Attorney General